

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:	)	Chapter 11
	)	
LEHMAN BROTHERS HOLDINGS INC.	)	Case No. 08-13555 (JMP)
	)	
Debtor.	)	Honorable James M. Peck
_____	)	

**NOTICE OF APPEARANCE  
AND REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that PEPPER HAMILTON LLP hereby appears in the above-captioned case on behalf of ING BANK, FSB, a party in interest.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to 11 U.S.C. 1109(b) and Bankruptcy Rules 2002 and 9010(b), demand is made that all notices given or required to be given, and all papers served or required to be served, be given and served upon:

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**PLEASE TAKE FURTHER NOTICE** that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any applications, motions, petitions, pleadings, plans, disclosure statements, complaints or demands transmitted or conveyed by mail, delivery, telephone, telegraph, telecopier, telex or otherwise, which are filed or made with regard to the captioned cases and proceedings herein.

**PLEASE TAKE FURTHER NOTICE** that neither this Entry of Appearance nor any subsequent appearance, pleading, claim or suit, is intended to waive (i) the Parties' right to have final orders in non-core matters entered only after *de novo* review by a district judge, (ii) the Parties' right to trial by jury in any proceedings or trial so triable herein or in any case, controversy or proceeding relating hereto, (iii) the Parties' right to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs or recoupments to which these Parties are or may be entitled under agreements, in law, in equity or otherwise, all of which rights, claims, actions, defenses, setoffs and recoupments these Parties expressly reserve. Further, this Entry of Appearance constitutes a special appearance and is not to be deemed a consent to or waiver of the right to challenge the jurisdiction of the Bankruptcy Court, including without limitation, the jurisdiction of the Court to adjudicate non-core matters, all of which rights are reserved without prejudice.

Dated: September 17, 2008

**PEPPER HAMILTON LLP**

/s/ Deborah Kovsky Apap  
Kay Standridge Kress (P39339)

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